

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

SHAWN M. DAVIS, individually and on behalf
of all others similarly situated,

Plaintiff,

Case No. 17-cv-992

-against-

NAVIENT CORPORATION, NAVIENT
SOLUTIONS, LLC, FORMERLY KNOWN
AS SALLIE MAE, INC., and STUDEBT,
ALSO KNOWN AS STUDENT DEBT
RELIEF GROUP, ALSO KNOWN AS
STUDENT LOAN RELIEF COUNSELORS,

Defendants.

**NOTICE OF MOTION TO DISMISS AND MOTION TO STRIKE CLASS
ALLEGATIONS BY DEFENDANTS NAVIENT SOLUTIONS, LLC AND NAVIENT
CORPORATION**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 12(b)(6) and 23, and upon the accompanying Memorandum of Law and the related exhibit, before the Honorable Lawrence J. Vilaro, United States District Judge, at the United States Courthouse, Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202, defendants Navient Corporation and Navient Solutions, LLC, will make a motion for an order dismissing this case in its entirety or, alternatively, strike the class allegations in the Class Action Complaint brought by Plaintiff Shawn M. Davis. Pursuant to Local Rule 7(a)(1), defendants state their intent to file a reply memorandum in support of this Motion following Plaintiff's response.

Dated: November 22, 2017

Respectfully submitted,

VEDDER PRICE (CA), LLC

By: /s/ Lisa M. Simonetti

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Navient Corporation